

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

\_\_\_\_\_  
UNITED STATES OF AMERICA )

v. )

Criminal No. 16-10094-1-LTS-MBB

ROSS MCLELLAN )  
and )  
EDWARD PENNINGS, )

Defendants. )  
\_\_\_\_\_)

**JOINT NOTICE CONCERNING NO-CONTACT PROVISION  
OF PRE-TRIAL RELEASE**

Pursuant to the Court's order, the parties hereby jointly notify the Court that they have reached agreement concerning the list of individuals covered by the no-contact provision of the defendant's pre-trial release. The parties intend to provide the list to the Probation Office, and will provide it to the Court, under seal, if so ordered.

Respectfully submitted,

ROSS MCLELLAN  
Defendant

CARMEN M. ORTIZ  
United States Attorney

By: /s/ Martin Weinberg  
MARTIN G. WEINBERG, ESQ.  
Counsel to the Defendant  
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Suite 1000  
Boston, MA 02116

By: /s/ Stephen E. Frank  
STEPHEN E. FRANK  
Assistant U.S. Attorney  
John Joseph Moakley U.S. Courthouse  
1 Courthouse Way, Suite 9200  
Boston, MA 02210

Date: April 20, 2016

**CERTIFICATE OF SERVICE**

I, Stephen E. Frank, hereby certify that on April 20, 2016, I served a copy of the foregoing on counsel of record in this case by electronic filing.

/s/ Stephen E. Frank  
STEPHEN E. FRANK  
Assistant U.S. Attorney